

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CYNTHIA RUSSO, LISA BULLARD,  
RICARDO GONZALES, INTERNATIONAL  
BROTHERHOOD OF ELECTRICAL  
WORKERS LOCAL 38 HEALTH AND  
WELFARE FUND, INTERNATIONAL  
UNION OF OPERATING ENGINEERS  
LOCAL 295-295C WELFARE FUND, AND  
STEAMFITTERS FUND LOCAL 439, on  
Behalf of Themselves and All Others Similarly  
Situated,

Plaintiffs,

v.

WALGREEN CO.,

Defendant.

Civil No. 17-cv-2246

Judge Edmond E. Chang  
Magistrate Judge Sheila Finnegan

**DECLARATION OF MICHAEL S. LEIB  
IN SUPPORT OF WALGREENS'  
SURREPLY IN OPPOSITION TO ITS  
MOTION FOR CLASS  
CERTIFICATION**

I, Michael S. Leib, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner at the law firm of Reed Smith LLP and admitted to practice before this Court. I submit this Declaration in support of Defendant Walgreen Co.'s Surreply in Opposition to Plaintiffs' Motion for Class Certification. I have personal knowledge of the facts set forth herein and could testify competently to them if called to do so.

2. Attached as **Exhibit 1** is a true and correct copy of excerpts of the August 11, 2023 deposition of Lynette Hilton, Ph.D.

Executed on this 3rd day of October, 2023, in New York, New York.

*/s/ Michael S. Leib*  
Michael S. Leib

**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of October, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the registered participants as identified on the Notice of Electronic Filing.

*/s/ Michael S. Leib*  
Michael S. Leib